IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

RTI HOLDING COMPANY, LLC, et al.,

Case No. 20-12456 (JTD)

Debtors.

(Jointly Administered)

NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Gibbons, P.C. ("Gibbons") and Holifield & Janich, PLLC ("Holifield"), co-attorneys for the Ad Hoc Group of Plan Participants (the "Ad Hoc Plan Group") of RTI Holding Company, LLC, *et al.*, the above-captioned debtors and debtors in possession herein (collectively, the "Debtors") hereby enters an appearance for and on behalf of the Ad Hoc Plan Group.

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code") and Fed. R. Bankr. P. Rules 2002 and 9010(b) (the "Bankruptcy Rules"), it is hereby requested that all papers, pleadings, motions and applications served or required to be served in this case, be given to and served upon the following:

Howard A. Cohen, Esq. **GIBBONS P.C.**

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1107 Kingston Pike Knoxville, TN 37934 Telephone: 856-566-0115 kmann@holifieldlaw.com PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and the papers referred to in the Bankruptcy Rules specified above, but also includes without limitation all orders and notices of any application, motion, petition, pleading, request, complaint or demand, statement of affairs, operating reports, schedule of assets and liabilities, whether formal or informal, whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, electronic mail or otherwise that: (1) may affect or seek to affect in any way any rights or interests of the Ad Hoc Plan Group or any creditor or party-in-interest with respect to (a) the Debtors or any related entity; (b) property or proceeds thereof in which the Debtors may claim an interest; or (c) property or proceeds thereof in the possession, custody or control of others that any of the Debtors may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct by any of the notice parties thereto.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive the Ad Hoc Plan Group's rights: (i) to have final orders in non-core matters, as well as statutory core matters in which the court lacks the constitutional authority to enter a final order absent the consent of the parties, entered only after de novo review by a district court judge; (ii) to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; and (iii) to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or any other rights, claims, actions, defenses, setoffs or recoupments to which the Ad Hoc Plan Group is and/or may be entitled under agreements, at law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

PLEASE TAKE FURTHER NOTICE that this appearance and request for notice is made without prejudice to the Ad Hoc Plan Group's rights, remedies and claims against other entities. All rights, remedies and claims are hereby expressly reserved.

Dated: November 3, 2020 Wilmington, Delaware

GIBBONS P.C.

By: /s/ Howard A. Cohen

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